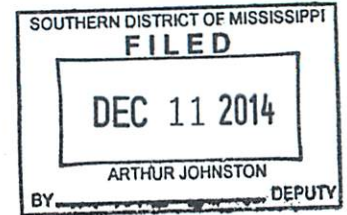


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION



UNITED STATES OF AMERICA

v.

CRIMINAL No. **3:14-cr-142 HTW-FKB**

SHELBY BROOKE RICHARDS

18 U.S.C. § 371

18 U.S.C. § 4

The United States charges that:

COUNT 1

From on or about April 1, 2011, through on or about March 22, 2012, in the Northern Division of the Southern District of Mississippi, the defendant, **SHELBY BROOKE RICHARDS**, along with others known and unknown to the government, did knowingly and willfully combine, conspire and agree to willfully cause bodily injury to, and through the use of dangerous weapons, attempt to cause bodily injury to, African American persons in and around Jackson, Mississippi, because of the actual and perceived race and color of those persons. The acts done in furtherance of this conspiracy resulted in the death of J.A.

Manner, Means and Objects of the Conspiracy

1. It was part of the Conspiracy that the defendant and other co-conspirators, including Deryl Paul DEDMON, John Aaron RICE, Dylan Wade BUTLER, William Kirk MONTGOMERY, Jonathan Kyle GASKAMP, Joseph Paul DOMINICK, John Louis BLALACK, Sarah Adelia GRAVES, Robert H. RICE and co-conspirator A, all young white men and women, would drive around Jackson during the night and early morning hours looking for African American persons to verbally harass and physically assault.

2. It was further part of the Conspiracy that the co-conspirators would use dangerous weapons, including, but not limited to beer bottles, sling shots, shod feet, and motor vehicles, to attempt to cause bodily injury to African American persons in and around Jackson.
3. It was further part of the Conspiracy that the co-conspirators would cause bodily injury to African American persons.
4. It was further part of the Conspiracy that the co-conspirators would particularly target individuals they believed to be homeless and/or under the influence of alcohol or controlled substances because they believed such victims would be less likely to report an assault and less able to resist an attack.
5. It was further part of the Conspiracy that the co-conspirators would encourage each other to cause bodily injury to and to use dangerous weapons in attempting to cause bodily injury to African American persons in Jackson.
6. It was further part of the Conspiracy that the co-conspirators usually carried one or more guns with them during and in relation to their trips to Jackson when they target African Americans for physical assaults.
7. It was further part of the Conspiracy that the co-conspirators boasted about their participation in racially motivated physical assaults in Jackson on prior occasions which involved the use of dangerous weapons and/or resulted in bodily injury to African American victims, thereby keeping other members of the Conspiracy informed of their actions.

8. It was further part of the Conspiracy that the co-conspirators solicited other young, white, men and women to join them while they carried out their plan to harass and assault African Americans.
9. It was further part of the Conspiracy that the co-conspirators concealed and covered up their actions by giving false statements to investigating law enforcement officials.

OVERT ACTS

To advance the Conspiracy and to achieve its aims, defendant **SHELBIE BROOKE RICHARDS**, along with others known and unknown to the government, committed various overt acts, within the Jackson Division of the Southern District of Mississippi, including but not limited to the following:

Incident One

1. On an occasion between April 1, 2011 and June 26, 2011, co-conspirators including DEDMON, J. RICE, GASKAMP, MONTGOMERY, R. RICE and BLALACK drove to Jackson, Mississippi, in the white Jeep driven by MONTGOMERY, with the purpose of finding an African American to assault.
2. Before the group left for Jackson, co-conspirator GASKAMP retrieved a .40 caliber handgun from his vehicle and carried it with him on the trip to Jackson.
3. Once in Jackson, the co-conspirators hurled beer bottles at African American pedestrians.
4. The co-conspirators then identified a vulnerable African American man, who was alone and appeared to be intoxicated, walking on the street at or near a golf course in Jackson.

5. Co-conspirators GASKAMP, DEDMON, and J. RICE physically assaulted the African American man by punching and kicking him in the body, head and face until the man begged for his life.
6. As the co-conspirators were driving away, co-conspirator GASKAMP requested that they stop the vehicle so that he could use the gun he had brought with him to shoot the African American man whom they just assaulted.

Incident Two

7. On another occasion between April 1, 2011 and June 26, 2011, co-conspirators including DEDMON, J. RICE, MONTGOMERY, R. RICE and BLALACK went to Jackson to find African Americans to verbally harass and physically assault.
8. While in Jackson, co-conspirator R. RICE, who was driving MONTGOMERY's Jeep, and his co-conspirators identified an African American male pedestrian.
9. Co-conspirator R. RICE pressed his foot on the gas of the Jeep and drove in the direction of the pedestrian, nearly hitting him with the vehicle.

Incident Three

10. On another occasion between April 1, 2011 and June 26, 2011, defendant RICHARDS, along with co-conspirators DEDMON, J. RICE, MONTGOMERY, BLALACK, GRAVES, R. RICE and others known to the government, drove around Jackson looking for African Americans to verbally harass and physically assault.
11. Several of the co-conspirators lured an African American man into thinking he was going to sell the co-conspirators drugs before co-conspirator BLALACK assaulted the man by punching him in the face.

Incident Four

12. On another occasion between April 1, 2011 and June 26, 2011, co-conspirators including DOMINICK, BUTLER, MONTGOMERY, BLALACK and co-conspirator A drove around Jackson looking for African Americans to verbally harass and physically assault.
13. At least one of the co-conspirators had a hand gun in co-conspirator DOMINICK'S truck.
14. Throughout the evening, co-conspirators hurled multiple glass beer bottles at African Americans they passed on the street.
15. One of the beer bottles was thrown by co-conspirator BLALACK at a group of African Americans who were standing on or near the street. At least one African American in the group fell to the ground after being struck by a bottle.
16. At some point during the evening, the co-conspirators stopped at a sporting goods store to purchase a sling shot for the express purpose of using it to shoot metal ball bearings at African Americans in Jackson.
17. Co-conspirator BLALACK made the purchase after co-conspirator A provided the money for the purchase.
18. The co-conspirators took turns using the slingshot to shoot metal ball bearings at vulnerable, visibly impaired African Americans they encountered.

The Assault and Death of J.A.

19. On or about June 25, 2011, defendant RICHARDS, other co-conspirators and others known and unknown to the government attended DOMINICK'S birthday party/bonfire in Puckett, Mississippi.

20. At some point during the party, defendant RICHARDS, other co-conspirators, and others known and unknown to the government began talking about going to Jackson, Mississippi, to harass and assault African Americans, whom they referred to as “niggers.”
21. Defendant RICHARDS and co-conspirator GRAVES asked people at the party to accompany them and their co-conspirators to Jackson to participate in the assault of African Americans.
22. Co-conspirator BLALACK gathered bottles at the party to use as ammunition for the planned trip to Jackson.
23. As the party ended in the early morning hours of June 26, 2011, defendant RICHARDS, along with other co-conspirators including DEDMON, J. RICE, BUTLER, BLALACK, GRAVES and MONTGOMERY agreed to reconvene at a Texaco gas station off Interstate Highway 20 in Brandon, Mississippi.
24. Co-conspirators BLALACK, MONTGOMERY, J. RICE, and BUTLER decided to drive a white Jeep belonging to MONTGOMERY to Jackson to carry out their plan to harass and assault African Americans.
25. Co-conspirators BLALACK, MONTGOMERY, J. RICE, and BUTLER agreed that defendant RICHARDS and co-conspirators DEDMON and GRAVES would later drive DEDMON’S green Ford F250 truck to join co-conspirators BLALACK, MONTGOMERY, J. RICE, and BUTLER in Jackson.
26. Co-conspirators BLALACK, MONTGOMERY, J. RICE, and BUTLER drove in the white Jeep to and around Jackson looking for African Americans to assault.
27. Co-conspirator MONTGOMERY was armed with a handgun.

28. As co-conspirator MONTGOMERY drove the vehicle around Jackson, co-conspirators BLALACK, J. RICE, and BUTLER hurled glass beer bottles from their moving vehicle at African Americans they encountered.
29. At approximately 4:45 a.m., co-conspirators BLALACK, MONTGOMERY, J. RICE, and BUTLER stopped at a Wendy's on Ellis Avenue in Jackson where they spotted J.A. standing next to his vehicle in the adjacent motel parking lot.
30. Co-conspirators BLALACK, MONTGOMERY, J. RICE, and BUTLER decided that J.A., a 47-year-old visibly intoxicated African American man, would be a good target for an assault.
31. Co-conspirators BLALACK, MONTGOMERY, J. RICE, and BUTLER debated with one another what to do with J.A. while they waited for co-conspirator GRAVES, defendant RICHARDS, and co-conspirator DEDMON to arrive in the green Ford F250.
32. Co-conspirators BLALACK and J. RICE distracted J.A. while waiting for co-conspirators DEDMON, GRAVES and defendant RICHARDS to arrive at their location.
33. Although co-conspirators DEDMON, GRAVES and defendant RICHARDS had left Brandon, Mississippi, after the white Jeep, the occupants of the two vehicles had been in contact with each other via electronic text and phone.
34. Co-conspirators BLALACK and J. RICE were successful at keeping J.A. in the parking lot of the motel until co-conspirators DEDMON, GRAVES and defendant RICHARDS arrived at approximately 5:00 a.m.
35. Defendant RICHARDS encouraged DEDMON to assault J.A.


36. DEDMON joined co-conspirators BLALACK and J. RICE, who were interacting with J.A. in the parking lot.
37. The physical assault began when co-conspirator J. RICE struck J.A. in the face without provocation, knocking J.A. to the ground.
38. Co-conspirator DEDMON then straddled J.A. and struck him repeatedly in the face and head with a closed fist.
39. Once the physical assault ended, co-conspirators BLALACK, MONTGOMERY, J. RICE, and BUTLER left the motel parking lot in the white Jeep.
40. At least one of the co-conspirators in the white Jeep yelled, "White Power," as the Jeep left the motel parking lot.
41. Just before co-conspirator DEDMON rejoined co-conspirator GRAVES and defendant RICHARDS in the green Ford F250, he yelled, "White Power," and raised his fist in the air.
42. Co-conspirator DEDMON returned to the driver's seat of the green Ford F250.
43. Defendant RICHARDS pointed out J.A. stumbling near the truck.
44. Defendant RICHARDS encouraged co-conspirator DEDMON to hit J.A. with his truck.
45. Defendant RICHARDS yelled a racial slur just before co-conspirator DEDMON ran over J.A.
46. Co-conspirator DEDMON used his green Ford F250 to intentionally hit J.A.
47. J.A. died as a result of the injuries he sustained on June 26, 2011.
48. Over the course of the next few days, co-conspirators BLALACK, MONTGOMERY, J. RICE and BUTLER agreed to lie to authorities about their reasons for being in Jackson and about their interactions with J.A.

All in violation of Section 371, Title 18, United States Code.

COUNT 2

On or about June 26, 2011, in Hinds County, in the Northern Division of the Southern District of Mississippi, defendant **SHELBY BROOKE RICHARDS**, knowing that a felony cognizable by a court of the United States had occurred, that is, a violation of Title 18, United States Code, Section 249, to wit: willfully causing bodily injury to J.A. and thru the use of a dangerous weapon, attempting to cause bodily injury to J.A. because of J.A.'s actual and perceived race and color, resulting in J.A.'s death, failed to make known the felony to some judge or other person in civil or military authority under the United States, and took an affirmative step to conceal the felony by providing false and deceitful information to law enforcement by telling detectives with the Jackson Police Department that she did not remember a reason for the fight between DEDMON and J.A., and that she did not encourage DEDMON to hit J.A. with the truck. These statements and representations were false because, as defendant **RICHARDS** then and there knew, DEDMON willfully assaulted and caused bodily injury to J.A. because of J.A.'s actual and perceived race and color by willfully using a dangerous weapon, to wit: his Ford F-250 truck; and, as defendant **RICHARDS** then and there knew, she encouraged DEDMON to hit J.A. with his Ford F-250 truck.

All in violation of Section 4, Title 18, United States Code.



GREGORY K. DAVIS
United States Attorney